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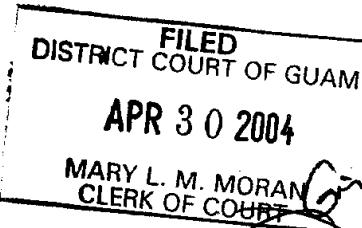
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Attorneys for Defendant The Hongkong and Shanghai Banking Corporation Ltd.

IN THE DISTRICT COURT OF GUAM

ALAN SADHWANI, LAJU)	CIVIL CASE NO. 03-00036
SADHWANI, and K. SADHWANI'S)	
INC., a Guam corporation,)	DECLARATION OF JACQUES G.
)	BRONZE IN SUPPORT OF <i>EX PARTE</i>
Plaintiffs,)	APPLICATION FOR ORDER STAYING
)	ALL DEPOSITIONS PENDING
v.)	DETERMINATION OF ITS MOTION
)	TO STRIKE THE FIRST AMENDED
HONGKONG AND SHANGHAI)	COMPLAINT IN WHOLE OR IN
BANKING CORPORATION, LTD.,)	PART, OR, IN THE ALTERNATIVE,
et al.,)	MOTION TO DISMISS THIRD AND
)	SIXTH CAUSES OF ACTION AND
Defendants.)	SANCTIONS
)	

I, JACQUES G. BRONZE, do hereby declare as follows:

1. I am over the age of eighteen (18) years and competent to make this Declaration.

I have personal knowledge of the matters stated herein and would be competent to testify thereto at any proceedings.

2. I am admitted to practice before this Court and am counsel responsible for the representation of Defendant The Hongkong and Shanghai Banking Corporation Limited ("HSBC"). A good faith effort has been made by counsel to advise counsel for Plaintiffs of the substance of HSBC's *Ex Parte* Application for Order Staying All Depositions Pending

Determination of HSBC's Motion to Strike ("Ex Parte Application"). Copies of all pleadings relating to the *Ex Parte* Application and Motion will be served upon Plaintiffs' counsel upon filing with this Court. The date and time the Court will consider the *Ex Parte* Application is not yet known. However, as soon as such information is made available to my office we will advise Plaintiffs' attorneys.

3. It is expected that counsel for Plaintiffs will oppose the *Ex Parte* Application and will desire to be present if and when the *Ex Parte* Application is either presented to or entertained by the Court.

4. It is important and urgent that this Application be heard as soon as possible because Plaintiffs have noticed four (4) depositions, currently scheduled for May 3rd, 5th, 7th and the 10th, 2004. Plaintiffs are also seeking to conduct two depositions in Hong Kong, at great expense to the parties. In the event that this Court grants HSBC's Motion to Strike, the First Amended Complaint in its entirety will be dismissed and none of the depositions will be necessary. On the other hand, the Court may grant the Motion to Strike in part and/or Dismiss in whole or part causes of action three and six of the First Amended Complaint. Under either circumstance, the scope and nature of Plaintiffs' claim will be altered which may affect the scope of discovery permissible in this case.

5. HSBC has requested that counsel for Plaintiffs stipulate to the entry of an Order staying all depositions pending a decision on the Motion to Strike and/or Dismiss, but Plaintiffs

Sadhwani, et al. v. Hongkong and Shanghai Banking Corporation Ltd., et al.

Civil Case No. 03-00036

Declaration of Jacques G. Bronze in Support of *Ex Parte* Application for Order Staying All Depositions Pending Determination of its Motion to Strike the First Amended Complaint in Whole or in Part, or, in the Alternative, Motion to Dismiss the Third and Sixth Causes of Action and Sanctions

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have refused. Due to the imminent depositions and the issued letters of request for depositions to be conducted in Hongkong on dates presently unknown, HSBC has no other alternative than to apply to this Court for ex parte relief.

6. This Declaration is made in compliance with Local Rule 7.1(j)(1).

I declare under penalty of perjury under the laws of the United States and Guam that the foregoing is true and correct.

Dated this 30th day of April, 2004.



JACQUES G. BRONZE